Exhibit C

KILGORE & KILGORE

LAWYERS

KI;GORE LAW CENTER
3109 CARLISLE
DALLAS, TX 75204
TEL: 214-379-0823
FAX 214-379-0840
WWW.KILGORELAW.COM

Robert E. Goodman, Jr.
reg@kilgorelaw.com

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By Email escalia@gibsondunn.com

Eugene Scalia
Gibson, Dunn & Crutcher, LLP
1050 Connecticut Ave., N.W.
Washington, DC 20036-5306

RE: Eddingston v. UBS Financial Services, Inc.
Hendricks v. UBS Financial Services, Inc.

Dear Gene:

This is to respond to your April 22, 2013 letter regarding the responses of the plaintiffs to the discovery requests of UBS.

To reciprocate your effort to avoid the necessity of a motion to compel, we are taking the following positions and I am taking the following actions:

With respect to interrogatory no. 2, I honestly believe that, given the legalistic nature of the common ERISA claim of the plaintiffs, there is not necessarily more detail to be provided, and if there is, that the level of detail you are seeking is most appropriate to a deposition. I would note that Paul did not pursue the same specific line of inquiry described in your letter in his deposition of the two representative plaintiffs. In any case, I am requesting the plaintiffs to reconsider their answers to this interrogatory and supplement those answers to be more specific in the ways that you have identified if they can do so.

I do think, apropos of your comment about Mr. Frisco, that many of the plaintiffs in these actions, only a portion being in Texas, are separated from each other, and unlike witnesses identified by Mr. Frisco, not otherwise familiar with each other, so I am not at sure there has been as much information sharing as there may have been in the case of Mr. Frisco. I have asked Mr. Bro, the attorney for Mr. Frisco of whom you speak, to himself address with the plaintiffs with whom he has acquaintance the issue he has raised, separate and apart from the requests for reconsideration referred to above, to make sure that the plaintiffs indicate precisely with whom they have spoken to obtain information that is responsive to interrogatory no. 2.

As far as Mr. Stacy is concerned, given the breadth of the interrogatory no. 2, think it unfair to suggest a conflict between his answer and his testimony, but he will be re-consulted on this interrogatory as well.

With respect to interrogatory no. 3, which relates back to the comparison to Mr. Frisco, I am likewise requesting plaintiffs to reconsider and supplement their answers to be more specific in providing the information described by you.

With respect to interrogatory no. 4, this gets into the issue of class versus merits discovery and your continuing position, which I have indicated I think is a canard, that plaintiffs have inserted the merits by merely making claims under ERISA on the ground that they are challenging the class action waivers as unenforceable under ERISA. It is obviously not enough for plaintiffs to make claims under a particular statute to cause the merits of their claims to be an issue in a certification context. If so, the merits would always be an issue in connection with certification, which the cases say is not true beyond a minimal point.

While you may not believe that plaintiffs did not have discussions with persons other than other plaintiffs concerning the PartnerPlus Plan applicable to them, except in very limited respects, such as that noted in your letter, I do not think that the answers of the plaintiffs, which you have characterized as rote, are likely to be different upon reconsideration. In any event, however, I am again requesting plaintiffs to reconsider and supplement their answers if there are any others with whom they addressed any issue relating to the PartnerPlus Plan applicable to them, and to provide pertinent facts and documents referred to in your letter if so.

With respect to interrogatory no. 7, we again have a scope of discovery issue, but you are correct that the forfeiture calculation refers to the disclosure of amounts forfeited by UBS itself. Also, it would seem that the applicable PartnerPlus Plan is, by itself, comparing it to the requirements of ERISA, prima facie proof of the validity of their claim of illegality, but I have no problem requesting plaintiffs to reconsider whether there are any other documents in their possession which in their lander standing supports their claim, and so am doing so.

With respect to interrogatory no. 8, the scope conflict is again pregnant, but I will come again requesting reconsideration of the responses in case there are any specific communications which we lawyers may regard as statements against interest, or admissions, that they can recall in regard to the issue of the stated purpose of the applicable Partner Plus Plan or otherwise.

With respect to interrogatory no. 11, the scope conflict is once again an issue. More to the point, it is not obvious what relevance subsequent employment has to the claim asserted in this action. Your letter does not identify the factual or legal basis for your assumption of relevance. Asking people about subsequent employers, if the sole purpose is going to be to subpoena those subsequent employers for seemingly irrelevant information of the type sought in interrogatory's and document request related to subsequent employers, as seems the intent from the recent third-party subpoenas, is actually harassing if there is a theory to tie the ERISA claim to the information sought, please let us know what is.

With respect to interrogatory no. 12, relating to the circumstances of departure from UBS, again we have a scope of discovery conflict but also a threshold relevance issue. You do not begin to explain the relevance although you again claim it. Please explain the relevance..

With respect to the request for production no. 11, we made significant efforts to assure that plaintiffs with documents produced them. You do not contest that. Your sole issue seems to be that there was an assertion by one plaintiff, Mr. Hendricks, of privilege. I will review the issue with Mr. Hendricks, including addressing the waiver issue implicit in your statement of position, with him.

With respect to request for production no. 13, I am requesting plaintiffs to reconsider their response to the request in light of your statement of position.

With respect to request for production nos. 23 and 33, these requests raise the same relevance issue as interrogatory no. 11 in addition to the scope of discovery issue.

With respect to request for production no. 33, this is a blunderbuss social media request. The plaintiffs are not going to agree to that, and I don't think the emerging law would warrants wholesale submission.

To address the hanging question of when, I will try to get further responses to you by Wednesday next week. I will be out part of Monday and all Tuesday. In the meantime, we can talk about these matters on Friday.

Please advise me accordingly.

Very truly yours,

Robert E. Goodman, Jr.